

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

ALLEN HANSON

Plaintiff

v.

**RHODE ISLAND DEPARTMENT OF
CORRECTIONS; PATRICIA A.
COYNE-FAGUE, in her capacity as
Director of the Rhode Island Department
of Corrections; and Officer Panerello**

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Case No.: 1:17-cv-00598

MOTION FOR LEAVE TO AMEND COMPLAINT

NOW COMES the Plaintiff, Allen Hanson, by and through counsel, pursuant to Rule 15, and hereby moves this Court for Leave to Amend Plaintiff's Complaint, in the form attached hereto as Exhibit A. In support hereof, Plaintiff avers that this proposed Amended Complaint is intended to provide clarification and particularity to the claims and allegations asserted by Plaintiff. Moreover, Plaintiff notes that his prior Complaints were prepared *pro se* and, therefore, his Amended Complaint should be allowed now that he has counsel.

WHEREFORE, Plaintiff respectfully requests that this Court grant Plaintiff Leave to File the proposed Amended Complaint in the form attached hereto as Exhibit A.

Respectfully submitted,

Plaintiffs,

By his attorney,

/s/ Stacey P. Nakasian

Stacey P. Nakasian, Esq., (#5069)

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Dated: November 4, 2020

CERTIFICATE OF SERVICE

I certify that on November 4, 2020, I electronically filed the foregoing document(s) and that they are available for viewing and downloading from the Court's CM/ECF system, and that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Stacey P. Nakasian